

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MELISSA ARZU, Individually and as the  
Administrator of the Estate of KEVIN ISMAEL  
GREENIDGE, Deceased and MELISSA ARZU  
Individually,

Plaintiffs,

-against-

AMERICAN AIRLINES, INC.,

Defendant.

Case No. 1:23-cv-02116

**PLAINTIFFS' FIRST DOCUMENT DEMANDS  
TO DEFENDANT AMERICAN AIRLINES, INC.  
REGARDING JURISDICTIONAL DEFENSES**

Plaintiffs demand that Defendant AMERICAN AIRLINES, INC. provide the following documents and things described below:

**REQUEST NO. 1**

Documentation regarding the airline ticket that KEVIN ISMAEL GREENIDGE was using at the time of incident, including connecting flights.

**REQUEST NO. 2**

Documentation regarding the purchase of the airline ticket that KEVIN ISMAEL GREENIDGE was using at the time of incident, including connecting flights.

**REQUEST NO. 3**

Copy of the ticket, receipt and itinerary for the trip that KEVIN ISMAEL GREENIDGE was on at the time of incident, including connecting flights.

**REQUEST NO. 4**

A copy of all leases that were in effect on March 13, 2023 (date complaint filed), that Defendant has entered into for the following items in the State of New York: properties, buildings, land, real estate, equipment, machinery, airplanes, hangars and any other items leased by defendant.

**REQUEST NO. 5**

A listing of all items and things, properties, buildings, land, real estate, equipment, machinery, airplanes, hangars and any other items owned by defendant on March 13, 2023 (date complaint filed) in the State of New York.

**REQUEST NO. 6**

A listing of all litigation that AMERICAN AIRLINES, INC. was a party to on March 13, 2023 (date complaint filed) in the State of New York, whether State, Federal, Administrative, or other litigation.

**REQUEST NO. 7**

A listing of all litigation cases that AMERICAN AIRLINES, INC. filed in the State of New York (whether State, Federal, Administrative, or other litigation) between March 13, 2018 and March 13, 2023 (date complaint filed).

**REQUEST NO. 8**

A listing of all offices/addresses that Defendant had in the State of New York as of March 13, 2023 (date complaint filed).

**REQUEST NO. 9**

A listing of all employees defendant had in the State of New York as of March 13, 2023 (date complaint filed), with their respective job titles.

**REQUEST NO. 10**

A listing of all flights that defendant operated within the State of New York on March 13, 2023.

**REQUEST NO. 11**

A copy of all contracts that were in effect on March 13, 2023 (date complaint filed), that Defendant had entered into with regard to services in the State of New York.

**REQUEST NO. 12**

Documentation regarding where and when the AED machine on board the subject flight was serviced, maintained, repaired and installed.

**REQUEST NO. 12**

Records of service, maintenance, repair and installation of the AED machine on board the subject flight.

Dated: May 25, 2023  
New York, NY

RHEINGOLD GIUFFRA RUFFO & PLOTKIN LLP  
Attorneys for Plaintiffs

/s/ Thomas P. Giuffra

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